

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

ELIZABETH SINES, ET AL.,

Plaintiffs,

v.

JASON KESSLER, ET AL.,

Defendants.

Case No. 3:17-cv-00072-NKM

Hon. Norman K. Moon

BRYAN J. JONES (VSB 87675)

106 W. South St., Ste. 211
Charlottesville, VA 22902
(P): (540) 369-2012
(F): (434) 381-4397
(E): bryan@bjoneslegal.com
*Attorney for Michael Hill, Michael Tubbs,
and League of the South*

COOLEY LLP

Robert T. Cahill (VSB 38562)
11951 Freedom Dr., 14th Fl.
Reston, VA 20190
(P): (703) 456-8000
(F): rcahill@cooley.com
(E): rcahill@cooley.com
Attorneys for Plaintiffs

KAPLAN & COMPANY, LLP

Roberta A. Kaplan
350 Fifth Ave., Ste. 7110
New York, NY 10118
(P): (212) 763-0883
(E): rkaplan@kaplanandcompany.com
(E): jfink@kaplanandcompany.com
Attorneys for Plaintiffs

BOIES SCHILLER FLEXNER LLP

Karen L. Dunn
William A. Isaacson
1401 New York Ave. NW
Washington, DC 20005
(P): (202) 237-2727
(F): kudunn@bsflp.com
(E): wisaacson@bsflp.com
Attorneys for Plaintiffs

BOIES SCHILLER FLEXNER LLP

Philip M. Bowman
575 Lexington Ave.
New York, NY 10022
(P): (212) 446-2300
(F): (212) 446-2350
(E): pbowman@bsflp.com
Attorneys for Plaintiffs

**MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT BY MICHAEL HILL,
MICHAEL TUBBS, AND LEAGUE OF THE SOUTH
(ORAL ARGUMENT REQUESTED)**

NOW COMES Michael Hill (“Hill”), Michael Tubbs (“Tubbs”), and League of the South (“LOTS”), by and through their undersigned attorney, and hereby move this Honorable Court to dismiss Plaintiff’s Amended Complaint—pursuant to Fed. R. Civ. P. 12(b)(6)—for the reasons set forth in their previously filed Motion to Dismiss and Brief in Support of Motion to Dismiss of Michael Hill, Michael Tubbs, and League of the South. The previous Motion to Dismiss and Brief in Support of Motion to Dismiss were filed with this court on November 10, 2017.

Respectfully submitted,

/s/ Bryan J. Jones
Bryan J. Jones (VSB 87675)
106 W. South St., Ste. 211
Charlottesville, VA 22902
(P): (540) 369-2012
(F): (434) 381-4397
(E): bryan@bjoneslegal.com
*Attorney for Michael Hill, Michael Tubbs,
and League of the South*

Dated: January 25, 2018

VII. PROOF OF SERVICE

I, Bryan J. Jones, affirm that I am an attorney of record for a party to the above-captioned civil action, and on January 25, 2018, I served a true and accurate copy of this document upon all attorneys of record who have registered to receive service of process via the Court's Electronic Filing System by submitting said documents to said System.

/s/ Bryan J. Jones

Bryan J. Jones (VSB 87675)

106 W. South St., Ste. 211

Charlottesville, VA 22902

(P): (540) 369-2012

(F): (434) 381-4397

(E): bryan@bjoneslegal.com

*Attorney for Michael Hill, Michael Tubbs,
and League of the South*

Dated: January 25, 2018